

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

| | | |
|--------------------------|---|-----------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| v. | § | 4:18-CR-00575-1 |
| | § | |
| JACK STEPHEN PURSLEY | § | |
| | § | |

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE LYNN H. HUGHES:

Comes now the Defendant, Jack Pursley, and respectfully requests the Court continue the current Order for Presentence Investigation and Sentencing based on the following:

1. The case is currently set for sentencing on December 9, 2019 at 1:30 P.M.
2. Pursuant to the Order Resetting Sentencing (Doc. 387), the initial presentence report (PSI) must be disclosed by November 4, 2019.
3. Mr. Lewis was recently retained to represent Mr. Pursley through sentencing. Mr. Lewis needs additional time to review the transcripts of all pretrial hearings and trial. As this Court is aware, there exists voluminous material relative to the transactions detailed in the indictment. Mr. Lewis must review, analyze and discuss this material with Mr. Pursley.
4. Pursuant to the Probation Department's request, Mr. Pursley has assembled a large amount of financial records to assist in the preparation of the PSI. Mr. Lewis has discussed this material with United States Probation Officer Hart and will deliver this material to her when Mr. Pursley is interviewed for the PSI.
5. Mr. Pursley is making arrangements to deposit the necessary funds into Mr. Lewis' trust account, so that his outstanding tax debt can be satisfied prior to sentencing. Mr. Lewis has conferred with the Government to facilitate the satisfaction of this tax debt.
6. The Government is unopposed to this request.
7. This Motion is not made for the purpose of delay, but in the interests of justice.

Mr. Lewis requests this continuance in order to preserve Mr. Pursley's constitutional right to effective assistance of counsel, due process and due course of law under the Fifth, Sixth and Fourteenth Amendments to the United States Constitution.

WHEREFORE PREMISES CONSIDERED the Defendant respectfully requests this Honorable Court extend the current scheduling order by at least ninety (90) days.

Respectfully submitted,

/s/ Chip B. Lewis

CHIP B. LEWIS

State Bar No. 00791107

Fed I.D. 24313

1207 S. Shepherd Dr.

Houston, Texas 77019

713-523-7878 Telephone

713-523-7887 Fax

chip@chiplewislaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been forwarded via email to AUSA Beaty, AUSA Albinson, AUSA Morgan and United States Probation Officer Raegin Hart on the 12th day of November 2019.

_____/s/Chip B. Lewis
CHIP B. LEWIS

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with AUSA Beaty, AUSA Albinson, AUSA Morgan regarding this Motion, and they are UNOPPOSED.

_____/s/Chip B. Lewis
CHIP B. LEWIS